

# **EXHIBIT “L”**

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1 repeat that.  
 2 Looks like they're frozen.  
 3 (Zoom connection interruption.)  
 4 MR. BEGAKIS: Can you ask the question again,  
 5 Ms. Interpreter?  
 6 (Interpreter complies.)  
 7 THE WITNESS: I believe it was around  
 8 33 years ago.  
 9 BY MR. BEGAKIS:  
 10 Q. So what year would that have been?  
 11 A. I don't recall.  
 12 Q. Mr. Chavez, I'm going to refer to Los  
 13 Originales de San Juan as "the band," and if I do so,  
 14 do you understand what I'm saying?  
 15 A. Yes.  
 16 Q. Mr. Chavez, who -- when the band was formed,  
 17 was it formed as a business entity?  
 18 MR. BERMAN: Objection to form, vague, and  
 19 compound question.  
 20 MR. LITTLEWOOD: Join.  
 21 THE WITNESS: Yes.  
 22 BY MR. BEGAKIS:  
 23 Q. What kind of business entity was it?  
 24 MR. BERMAN: Objection to form, vague.  
 25 MR. LITTLEWOOD: Also calls for legal

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1 conclusion.  
 2 THE WITNESS: We did a partnership, three  
 3 people.  
 4 BY MR. BEGAKIS:  
 5 Q. Did you understand that partnership to be a,  
 6 quote, unincorporated partnership?  
 7 MR. BERMAN: Objection to form, vague.  
 8 BY MR. BEGAKIS:  
 9 Q. You can answer, Mr. Chavez.  
 10 A. Could you ask that question again?  
 11 Q. Did you understand that partnership to be an  
 12 unincorporated partnership?  
 13 MR. BERMAN: Same objections.  
 14 BY MR. BEGAKIS:  
 15 Q. You can answer, Mr. Chavez.  
 16 MR. LITTLEWOOD: You broke up. You broke up,  
 17 John.  
 18 MR. BEGAKIS: Oh.  
 19 MR. LITTLEWOOD: I'm sorry, I'll have to ask  
 20 you to repeat it again.  
 21 MR. BEGAKIS: No problem.  
 22 BY MR. BEGAKIS:  
 23 Q. Did you understand the partnership to be an  
 24 unincorporated partnership, Mr. Chavez?  
 25 MR. BERMAN: Same objections.

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1 THE WITNESS: No.  
 2 BY MR. BEGAKIS:  
 3 Q. In what state was the partnership registered  
 4 with?  
 5 MR. BERMAN: Objection to form, vague.  
 6 THE WITNESS: Here in Fresno.  
 7 BY MR. BEGAKIS:  
 8 Q. Okay. Was there a written agreement for the  
 9 partnership?  
 10 A. Yes, but --  
 11 THE INTERPRETER: This is the interpreter  
 12 speaking, I just need to ask him what the last part of  
 13 his answer was because it cut out.  
 14 THE WITNESS: Yes. But then it was broken  
 15 because the person that played the accordion left, and  
 16 all that was left was Alfonso Vargas and myself.  
 17 BY MR. BEGAKIS:  
 18 Q. Do you have a copy of that written agreement?  
 19 A. I think it's at home.  
 20 Q. Do you know if it's been produced in this  
 21 lawsuit?  
 22 A. No.  
 23 Q. Why not?  
 24 MR. BERMAN: Objection. Calls for  
 25 speculation.

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1 BY MR. BEGAKIS:  
 2 Q. You can answer, Mr. Chavez.  
 3 A. No. Well, I did not know.  
 4 Q. Who were the original founding members of the  
 5 band, Mr. Chavez?  
 6 A. I did. So it was Jesus, Domingo, Alfonso and  
 7 Jose Torres.  
 8 No, pardon me. It was Jesus, Domingo and  
 9 Jose Torres.  
 10 Q. And this written agreement that you referred  
 11 to was an agreement between the four of you?  
 12 MR. BERMAN: Please note my objection to form  
 13 and vague and mischaracterizing prior testimony.  
 14 THE WITNESS: Yes.  
 15 BY MR. BEGAKIS:  
 16 Q. What were the percentages of ownership for  
 17 the partnership?  
 18 You can answer, Mr. Chavez.  
 19 A. All four of us had the same share.  
 20 Q. Mr. Chavez, how were band decisions made  
 21 amongst four members?  
 22 MR. BERMAN: Objection to form and vague.  
 23 THE INTERPRETER: This is the interpreter  
 24 speaking.  
 25 I believe there was an objection, so I might

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1 have missed part of his answer, so I'm going to ask  
 2 him to repeat that.  
 3 THE WITNESS: I would make the decisions.  
 4 BY MR. BEGAKIS:  
 5 Q. Did all four members agree to that?  
 6 A. Yes.  
 7 Q. Is that agreement reflected in the  
 8 partnership agreement that you state you have?  
 9 MR. BERMAN: Objection to form, vague.  
 10 THE WITNESS: Yes.  
 11 BY MR. BEGAKIS:  
 12 MR. BERMAN: Also, Ms. Reporter [sic], I'm  
 13 going to ask you -- to remind you that after  
 14 Mr. Begakis asks his questions, will you allow me to  
 15 interject my objections before translating?  
 16 THE INTERPRETER: You mean the interpreter?  
 17 Yes.  
 18 MR. BERMAN: Thank you.  
 19 BY MR. BEGAKIS:  
 20 Q. Mr. Chavez, are there any other documents  
 21 that reflect your understanding with the members  
 22 regarding what you are stating today, that you were  
 23 the one who made the decisions for the band?  
 24 MR. BERMAN: Objection, vague.  
 25 THE WITNESS: No. Only the bank account at

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1 the bank.  
 2 BY MR. BEGAKIS:  
 3 Q. What do you mean by that?  
 4 A. So every weekend we would do the math, and we  
 5 would divide the profits.  
 6 Q. Well, Mr. Chavez, you made a reference to the  
 7 bank account, so I'm asking, what did you mean when  
 8 you responded to my last question by referring to the  
 9 bank account?  
 10 MR. BERMAN: Objection to form, vague.  
 11 THE WITNESS: I don't have any other  
 12 documents. I just have their names.  
 13 BY MR. BEGAKIS:  
 14 Q. Okay. So to be clear, Mr. Chavez, there are  
 15 no other documents, other than the purported  
 16 partnership agreement, which set forth how band  
 17 decisions were made, correct?  
 18 A. That is correct.  
 19 Q. Are there any other documents between you and  
 20 each of the band members regarding each band member's  
 21 role in the band?  
 22 MR. BERMAN: Objection to form, vague.  
 23 MR. LITTLEWOOD: Can you repeat the question,  
 24 please? We froze.  
 25 BY MR. BEGAKIS:

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1 Q. Are there any other written agreements  
 2 between you and the other band members regarding each  
 3 band member's role in the band?  
 4 A. No.  
 5 Q. What instrument do each of the band members  
 6 play, Mr. Chavez?  
 7 MR. BERMAN: Objection to form, vague.  
 8 MR. LITTLEWOOD: Vague as to time.  
 9 BY MR. BEGAKIS:  
 10 Q. When the band was formed -- strike -- I'll  
 11 withdraw the question.  
 12 When the band was formed, what instruments  
 13 did each of the band members play?  
 14 THE INTERPRETER: This is the interpreter  
 15 speaking.  
 16 I'm just going to inquire to make sure I  
 17 heard everything.  
 18 MR. BEGAKIS: Ms. Interpreter, are we waiting  
 19 on you for a response?  
 20 Sorry.  
 21 THE WITNESS: It was the accordion. It was  
 22 the bass, electric bass, the six bass and the drums.  
 23 BY MR. BEGAKIS:  
 24 Q. Who played what?  
 25 THE INTERPRETER: The interpreter speaking,

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1 he cut out.  
 2 THE WITNESS: So Simon Saucedo, he has now  
 3 passed away, and he would play the electric bass.  
 4 BY MR. BEGAKIS:  
 5 Q. What did the other band members play?  
 6 A. Domingo Torres would play the accordion,  
 7 Alfonso Vargas would play the drums.  
 8 THE INTERPRETER: This is the interpreter  
 9 speaking.  
 10 I'm going to ask him to repeat that.  
 11 THE WITNESS: And I would play the six bass.  
 12 BY MR. BEGAKIS:  
 13 Q. Were you also the lead vocalist?  
 14 A. Yes.  
 15 Q. Did you write any of the songs?  
 16 A. Several.  
 17 Q. Did you create -- did you contribute anything  
 18 else creatively to the band other than the instrument  
 19 that you play and as a lead vocalist?  
 20 MR. LITTLEWOOD: Objection. Misstates his  
 21 testimony and vague.  
 22 THE WITNESS: Yes. I would write my own  
 23 songs.  
 24 BY MR. BEGAKIS:  
 25 Q. Okay. With respect to the partnership

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1 the band at that time?

2 MR. BERMAN: Objection to form, vague, lacks

3 foundation, mischaracterizes testimony.

4 MR. LITTLEWOOD: Join. Assumes facts.

5 THE WITNESS: No.

6 BY MR. BEGAKIS:

7 Q. Okay. Mr. Chavez, did you record five albums

8 with Hyphy Music from 2013 to 2017?

9 MR. BERMAN: Objection to form, vague. Also,

10 assumes a fact not in evidence.

11 THE WITNESS: Yes.

12 BY MR. BEGAKIS:

13 Q. Mr. Chavez, can you state the names of those

14 five albums for me, please?

15 A. I don't recall the names of the albums.

16 Q. Was Amigos y Contrarios one of those albums?

17 A. Yes.

18 Q. When did you record Amigos y Contrarios?

19 A. I don't remember.

20 Q. Who were the other band members at the time

21 that you recorded Amigos y Contrarios?

22 A. The Inquietos del Norte.

23 MR. BEGAKIS: I'm sorry, was that supposed to

24 be his answer in English?

25 THE INTERPRETER: This is the interpreter

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1 speaking. I believe he mentioned the name of a band,

2 Los Inquietos del Norte.

3 MR. BEGAKIS: Oh, okay.

4 BY MR. BEGAKIS:

5 Q. So, Mr. Chavez, it is your testimony that you

6 recorded Amigos y Contrarios through this other band?

7 A. So this singer was only the second singer for

8 me, but it was only the singer.

9 Q. Did any of the other original band members

10 record Amigos y Contrarios with the band?

11 MR. LITTLEWOOD: Objection. Lacks

12 foundation, vague.

13 THE WITNESS: No.

14 BY MR. BEGAKIS:

15 Q. Where did the band record Amigos y

16 Contrarios?

17 MR. LITTLEWOOD: Objection. Lacks

18 foundation, misstates testimony.

19 THE WITNESS: In a studio in Selma.

20 BY MR. BEGAKIS:

21 Q. You recall the name of the studio?

22 THE INTERPRETER: This is the interpreter

23 speaking.

24 I'm just going to ask him to repeat that

25 again.

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1 THE WITNESS: Morillo Studio.

2 BY MR. BEGAKIS:

3 Q. Who paid for the recording studio?

4 A. I did.

5 Q. Who was the recording engineer at the studio?

6 A. Omar Rosales.

7 Q. So it is your testimony that only you and one

8 other singer recorded Amigos y Contrarios?

9 MR. BERMAN: Objection to form, vague and

10 assumes a fact not in evidence.

11 THE WITNESS: That's right.

12 BY MR. BEGAKIS:

13 Q. Did you have a written agreement with this

14 singer for her contribution or for this singer's

15 contribution to the work?

16 A. No.

17 Q. Why not?

18 A. Because we're friends.

19 Q. How much did you pay this singer?

20 MR. LITTLEWOOD: Objection. Assumes facts.

21 THE WITNESS: The singer did not charge me

22 anything.

23 BY MR. BEGAKIS:

24 Q. Did the singer obtain anything of value for

25 recording Amigos y Contrarios?

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1 A. No.

2 Q. How much did Hyphy Music pay you to record

3 Amigos y Contrarios?

4 MR. LITTLEWOOD: Objection. Assumes facts,

5 lacks foundation.

6 THE WITNESS: We made an agreement, but they

7 never -- they never carried out the agreement.

8 BY MR. BEGAKIS:

9 Q. That's not what I asked you, Mr. Chavez.

10 How much did Hyphy Music pay you to record

11 Amigos y Contrarios?

12 MR. LITTLEWOOD: Same objections.

13 MR. BERMAN: Please note my objection.

14 Objection to form, vague, misleading question,

15 misstates his testimony.

16 THE WITNESS: I was not paid anything.

17 BY MR. BEGAKIS:

18 Q. What were the terms of your agreement with

19 Hyphy Music to record Amigos y Contrarios?

20 MR. BERMAN: Objection to form.

21 MR. LITTLEWOOD: Objection. Assumes facts,

22 lacks foundation, calls for speculation.

23 MR. BERMAN: Join.

24 THE INTERPRETER: This is the interpreter

25 speaking.